

November 19, 2007

Hon. Phillip Isenberg, Chairman  
Delta Vision Blue Ribbon Task Force  
650 Capitol Mall  
Sacramento, CA 95814

**Re: Comments on the Second Draft Delta Vision**

Dear Chairman Isenberg and Task Force members:

The Santa Clara Valley Water District (District) commends you for your efforts to develop a comprehensive vision that will help secure California's water future and the Delta environment.

The District, which is both a State Water Project and federal Central Valley Project contractor, provides wholesale water supplies to the 1.8 million residents of Santa Clara County and Silicon Valley. Approximately half of our annual water supplies come to us via the Delta. Consequently, we are keenly interested in your work. As a signatory to comment letters already submitted by Water/Business Stakeholders and by the California Urban Water Agencies, we focus here on a few issues that either weren't included in those communications or that we wish to emphasize further.

It will be no surprise that the draft vision's declaration that "we" should expect reduced water exports in the future is especially troubling. This statement simply has no place in a Delta Vision, ostensibly intended to be an aspirational projection of an optimum future condition.

Currently reduced exports are a consequence of recent court decisions and related ecosystem management problems. There is no explanation of why such reductions must be expected to continue in perpetuity, especially since there will no doubt be significant, new infrastructure and environmental restoration investments to improve operational capabilities and ecosystem health. Future operations in the Delta will be governed (as they are now) reflecting hydrology, regulatory constraints, and the capabilities of facilities in place. There is no basis for a predetermination that water users should "expect" reduced exports.

Delta Vision must be more than acquiescence to an unacceptable status-quo when it comes to augmenting water supply, reliability and quality, just as for the environment. Including a statement identifying a future outcome or condition of the implementation of the Delta Vision to be reduced exports is inconsistent with the charge of the Task Force, particularly if, as it must, aggressive action – near-term and long-term – is part of the Task Force's strategic plan.

Additionally, this pronouncement is inconsistent with the Task Force's own determination that there should be a focus on shifting pumping to wetter periods to reduce reliance on pumping during drier periods. Such an operational regime could result in more or less exports (on an annual aggregate basis or during specific time periods) depending, as noted above, on hydrology, regulatory requirements, and capabilities of facilities. South-of-Delta conjunctive use



projects and water transfers, tools that can help facilitate temporal shifting in pumping, are most effective when high flows can be pumped, captured and put into reserve storage. At times, this will require not less but more exports within a particular window. Ultimately, the focus of Delta Vision should be on maximizing operational flexibility to meet California's water supply needs while recovering a healthy, sustainable Delta ecosystem.

Of course, this begs the question, "What ecosystem?" Conspicuously absent from the draft is the relationship of the Bay-Delta Conservation Plan to, and as a necessary part of, the Delta Vision you are developing.

We support moving forward with an ecosystem design program that acknowledges and incorporates the realities of invasive species, climate change, and the incredibly altered and "unnatural" nature of the Delta ecosystem. The efforts of the last decade, while well intentioned, have not achieved the sustainability and recovery we all hoped for.

As Dr. Healy states in his "Design Principles" paper; "Attempting to hold the system for too long in a particular configuration, when all the evidence suggests it cannot remain there, can result in an unmanageable collapse." Unfortunately, pelagic organisms in particular may already be there, no matter what heroic efforts utilizing regulatory prescriptions against the projects might be imposed. We concur with Dr. Healy that "an iterative approach that cycles among tentative conceptualizations of the problem, provisional solutions, and relevant analyses linking the two in an adaptive and staged program of implementation is needed." It's been needed for years. It's time to get on with it.

Consistent with our previous point about the unsubstantiated inclusion of a statement regarding an expectation of "reduced exports", Dr. Healy concludes that, "Although proponents of environmental conservation argue for higher flows and a more natural hydrograph, I find it difficult to say with certainty how much benefit would derive from such a change in the Bay-Delta ecosystem, which has been changed in so many ways over the past century."

The PPIC report put it this way: "many of the basic concepts of how the system worked—which formed the basis for decisions regulating outflow by the State Water Resources Control Board—were wrong or inadequate." This situation needs to be rectified as soon as possible to restore confidence in the investment of bond and ratepayer dollars, as well as water supplies dedicated to maintaining flows, which would otherwise be available for other beneficial.

We recognize there will always be uncertainty when dealing with such a complex ecosystem. We also acknowledge that the state and federal endangered species acts constrain flexibility often resulting in less effective environmental management in such an unnatural system. Again, the BDCP would seem to have much to offer in this context and should be integrated into Delta Vision.

The specious concept of "regional self-sufficiency" is another component of the draft Vision that should be eliminated. Unfortunately, this conceit seems to have taken on a life of its own as a way to ameliorate the inclusion of "reduced exports" as a preconception of the Vision. However, for almost all of California, there is, and can be, no such thing as "regional self-sufficiency" when it comes to provision of reliable water supplies over the long term. That bridge was crossed

almost a century ago with the construction of the Hetch-Hetchy system and subsequent water importation projects in northern and southern California. California's explosive population growth only reinforces the fallacy.

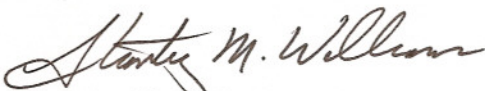
We urge that this concept also be excised from the Vision, unless it is better defined and put in proper context. A direction that urges investments to allow water purveyors to be less dependent on supplies conveyed through the Delta and/or diverted upstream during drought or times of environmental stress on the system would be practical and realistic. This would be consistent with the Vision's general call for infrastructure investment (including storage and conveyance -- which we applaud) and with the concept of project operational criteria allowing the export of more water during peak flow periods while seeking to cut back during low flow and environmentally sensitive periods.

Though the draft vision has an excellent statement about the need for investment in facilities, there is an impression that conveyance only improves things if combined with new storage as well. "Building new conveyance alone, without new storage, would seriously compromise the ability to protect the estuary and provide sufficient environmental flows" is an overstatement.

Conveyance alone can in fact provide multiple benefits to the system, including water supply and supply reliability, improved water quality, flood flow conveyance, and environmental enhancements. While storage would increase those benefits, that doesn't mean conveyance shouldn't move forward absent a concomitant commitment on storage. This statement also implicates the Vision's relationship to the BDCP effort since BDCP is considering an isolated facility as a conservation measure but storage is beyond its purview. It is the case that combining new storage (surface and conjunctive use) with conveyance probably does get you something greater than the sum of their parts, it doesn't mean the latter should be held hostage to the former.

Thank you for the opportunity to comment and provide some additional perspective. We look forward to working together as Delta Vision moves forward. Thank you again for your dedication to finding a comprehensive approach to addressing this critical issue confronting California.

Sincerely,



Stanley M. Williams  
General Manager

cc: Governor Arnold Schwarzenegger  
Mike Chrisman, Secretary for Resources  
Lester Snow, Director, Department of Water Resources